

FILED

**UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO**

IN THE UNITED STATES DISTRICT COURT

JUN 25 2020

FOR THE DISTRICT OF NEW MEXICO

**MITCHELL R. ELFERS
CLERK**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**AMADO MARTIN VARGAS
HERNANDEZ,**

Defendant.

CRIMINAL NO. 20-1443 MV

Count 1: 16 U.S.C. § 668: Bald and
Golden Eagle Act (Class A
Misdemeanor);

Count 2: 16 U.S.C. §§ 703 and 707(a):
Migratory Bird Treaty Act (Class B
Misdemeanor).

INFORMATION

The United States Attorney charges:

Count 1

On or about November 14, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **AMADO MARTIN VARGAS HERNANDEZ**, did unlawfully possess without permission the feathers of birds protected by the Bald and Golden Eagle Protection Act, to wit, the feathers of and parts of Bald Eagles (*Haliaeetus leucocephalus*) and feathers and parts of Golden Eagles (*Aquila chrysaetos*).

In violation of 16 U.S.C. § 668(a).

Count 2

On or about November 14, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **AMADO MARTIN VARGAS HERNANDEZ**, did unlawfully possess without permission the feathers and parts of birds protected by the Migratory Bird Treaty Act, to wit, feathers and parts of Sharp-shinned hawks (*Accipiter striatus*), American Kestrels (*Falco sparverius*), Greater roadrunners (*Geococcyx californianus*), Red-tailed hawks (*Buteo*

jamaicensis), Northern flickers (*Colaptes auratus*), White-winged doves (*Zenaida asiatica*), Crested Caracaras (*Caracara cheriway*), Cooper's hawks (*Accipiter cooperii*), Bald Eagles (*Haliaeetus leucocephalus*), Golden Eagles (*Aquila chrysaetos*), and Barred owls (*Strix varia*).

In violation of 16 U.S.C. §§ 703 and 707(a).

FORFEITURE ALLEGATIONS

Upon conviction of any of the offenses alleged in this Information, the defendant, **AMADO MARTIN VARGAS HERNANDEZ**, shall forfeit to the United States, pursuant to 16 U.S.C. §§ 703 and 706, any interest he may have in the following property, seized during the execution of a search warrant on November 14, 2019, including the feathers and parts of:

- (a) Bald Eagles (*Haliaeetus leucocephalus*),
- (b) Golden Eagles (*Aquila chrysaetos*),
- (c) Sharp-shinned hawks (*Accipiter striatus*),
- (d) American Kestrels (*Falco sparverius*),
- (e) Greater roadrunners (*Geococcyx californianus*),
- (f) Red-tailed hawks (*Buteo jamaicensis*),
- (g) Northern flickers (*Colaptes auratus*),
- (h) White-winged doves (*Zenaida asiatica*),
- (i) Crested Caracaras (*Caracara cheriway*),
- (j) Cooper's hawks (*Accipiter cooperii*),
- (k) Barred owls (*Strix varia*), and

- (l) Turkey Vultures (*Cathartes aura*).

JOHN C. ANDERSON
United States Attorney

A handwritten signature in cursive script, reading "Novaline D. Wilson", written over a horizontal line.

NOVALINE D. WILSON
Assistant United States Attorney
Post Office Box 607
Albuquerque, New Mexico 87102
(505) 224-1419